

Exhibit B

Exhibit 2:

Redacted

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

	-	-	-
SHABTAI SCOTT SHATSKY,)	Case No. 18-Civ. 12355	
individually and as)		
personal representative)	CONFIDENTIAL	
of the Estate of Keren)	VIRTUAL VIDEOTAPED	
Shatsky, J ANNE)	DEPOSITION OF NADIA	
SHATSKY, individually)	GHANNAM	
and as personal)		
representative of the)		
Estate of Keren)		
Shatsky, TZIPPORA)		
SHATSKY SCHWARZ, YOSEPH)		
SHATSKY, SARA SHATSKY)		
TZIMMERMAN, MIRIAM)		
SHATSKY, DAVID RAPHAEL)		
SHATSKY, GINETTE LANDO)		
THALER, individually)		
and as personal)		
representative of the)		
Estate of Rachel)		
Thaler, LEOR THALER,)		
ZVI THALER, ISAAC)		
THALER, HILLEL)		
TRATTNER, RONIT)		
TRATTNER, ARON S.)		
TRATTNER, SHELLEY)		
TRATTNER, EFRAT)		
TRATTNER, HADASSA)		
DINER, Yael HILLMAN,)		
STEVEN BRAUN, CHANA)		
FRIEDMAN, ILAN)		
FRIEDMAN, MIRIAM)		
FRIEDMAN, YEHIEL)		
FRIEDMAN, ZVI FRIEDMAN,)		
and BELLA FRIEDMAN,)		
)		
)		
Plaintiffs,)		
)		
)		
against)		
)		
)		
)		
)		
)		

1)
THE PALESTINE)
2 LIBERATION ORGANIZATION)
and THE PALESTINIAN)
3 AUTHORITY (a/k/a "The)
Palestinian Interim)
4 Self-Government)
Authority" and/or "The)
5 Palestinian National)
Authority"),)
6)
7 Defendants.)

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1 VIRTUAL VIDEOTAPED DEPOSITION OF NADIA
2 GHANNAM, witness herein, called by the
3 Plaintiffs, for examination, taken pursuant to
4 the Federal Rules of Civil Procedure, by and
5 before Karen A. Nickel, a Certified Realtime
6 Reporter and a notary public in and for the
7 Commonwealth of Pennsylvania, held remotely
8 with all parties appearing from their
9 respective locations, on Friday, July 23, 2021,
10 at 9:30 a.m.

11 COUNSEL PRESENT:

12 For the Plaintiffs:
13 Ronald F. Wick, Esq. (Admitted Pro Hac Vice)
14 Cohen & Gresser, LLP
15 2001 Pennsylvania Avenue, NW
Suite 300
Washington, DC 20006

16 Stephen M. Sinaiko, Esq.
17 Cohen & Gresser, LLP
18 800 Third Avenue
New York, NY 10022

19 For the Defendants:
20 Mitchell R. Berger, Esq.
Joseph Alonzo, Esq.
21 Salim Kaddoura, Esq.
Squire Patton Boggs
22 2550 M Street NW
Washington, DC 20037

23 Also Present: Cosette Vincent
24 Eszter Vincze
25

July 23, 2021

- - -
I N D E X

WITNESS PAGE

Nadia Ghannam

By Mr. Sinaiko 6

E X H I B I T S

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P R O C E E D I N G S

THE VIDEOGRAPHER: Good

morning, everyone. We are now on the record. Participants should be aware that this proceeding is being recorded and, as such, all conversations held will be recorded unless there is a request and agreement to go off the record.

This is the remote video-recorded deposition of Nadia Ghannam. Today is Friday, July 23, 2021. The time is now 13:31 UTC time.

We are here in the matter of Shatsky versus PLO. My name is Corey Wainaina, remote video technician on behalf of US Legal Support located at 90 Broad Street, New York, New York. I am not related to any party in this action, nor am I financially interested in the outcome.

At this time, will the reporter, Karen Nickel, on behalf of US Legal Support, please enter the statement for remote proceedings into the record.

THE REPORTER: The attorneys participating in this deposition acknowledge that I am not physically present in the deposition room and that I will be reporting

1 this deposition remotely.

2 They further acknowledge that, in
3 lieu of an oath administered in person, the
4 witness will verbally declare her testimony in
5 this matter is under penalty of perjury.

6 The parties and their counsel
7 consent to this arrangement and waive any
8 objections to this manner of reporting. Please
9 indicate your agreement by stating your name
10 and your agreement on the record.

11 MR. SINAIKO: My name is Steve
12 Sinaiko. I'm with Cohen & Gresser, LLP, in New
13 York City. I'm here on behalf of the
14 Plaintiffs today, and on behalf of the
15 Plaintiffs, I agree.

16 MR. BERGER: This is Mitchell
17 Berger from Squire Patton Boggs, Washington,
18 D.C., on behalf of the Defendants, and we
19 agree.

20 NADIA GHANNAM, a witness herein,
21 having been first duly sworn, was examined and
22 testified as follows:

23 EXAMINATION

24 BY MR. SINAIKO:

25 Q. Before we get started, I think there

1 is a little bit of difficulty hearing
2 Ms. Ghannam when she speaks. There is a little
3 bit of a delay, I think.

4 A. Can you hear me now?

5 Q. Better. Still, the video and the
6 audio aren't synced. I guess that's not such a
7 big deal. Do you want to try one more time?

8 A. Can you hear me now?

9 Q. It's okay. All right.

10 MR. SINAIKO: Before we get
11 started, I have one housekeeping matter that I
12 would like to just take up with Mr. Berger.

13 Mr. Berger, I take you and Ms.
14 Ghannam are in your office in Washington, D.C.
15 now; is that correct?

16 MR. BERGER: That is correct.

17 MR. SINAIKO: Okay. And you
18 understand that our court reporter for today,
19 Ms. Nickel, is in Pittsburgh, Pennsylvania;
20 correct?

21 MR. BERGER: I do. I didn't
22 realize I would get to be examined. This is
23 wonderful.

24 MR. SINAIKO: I'm just -- I'm
25 just confirming that we all understand what the

1 facts are. I'm not trying to examine -- I
2 mean, yeah, I guess maybe I am a little bit.
3 That's fine. It's what I do.

4 So I just want to ask that the
5 Defendants confirm, pursuant to Rule 30(b)(4)
6 of the Federal Rules of Civil Procedure, that
7 today's deposition can be taken by video
8 conference as we are proceeding.

9 MR. BERGER: On behalf of
10 Defendants, we so agree.

11 MR. SINAIKO: And pursuant to
12 Rule 29 of the Federal Rules of Civil
13 Procedure, do the parties also stipulate that,
14 although Ms. Ghannam and you are in Washington,
15 D.C. and Ms. Nickel is located in Pennsylvania,
16 obviously not the same state, that Ms. Nickel
17 is an appropriate officer before whom this
18 deposition can be taken?

19 MR. BERGER: Yeah, on behalf
20 of Defendants, we so agree.

21 MR. SINAIKO: Great. So
22 everybody has so stipulated and we can get
23 started.

24 BY MR. SINAIKO:

25 Q. Good morning, Ms. Ghannam.

1 A. Good morning.

2 Q. Thank you for being here today. As
3 I said a moment ago, my name is Steve Sinaiko.
4 I am with the law firm of Cohen & Gresser, LLP,
5 in New York City, and I represent the
6 Plaintiffs in this lawsuit.

7 Have you ever had your deposition
8 taken before?

9 A. No.

10 Q. Okay. So what I would like to do at
11 the outset is just go over a couple of basic
12 ground rules so that everybody is on the same
13 page about how things are going to unfold
14 today. Would that be all right?

15 A. Yes.

16 Q. Okay. You remember that a moment
17 ago you took an oath to tell the truth?

18 A. Yes.

19 Q. And I'm going to be asking you a
20 series of questions today. Obviously, you have
21 taken an oath so your answers to those
22 questions are under penalty of perjury; do you
23 understand?

24 A. Yes.

25 Q. Okay. And there is a court reporter

1 here, Ms. Nickel. She is going to be
2 transcribing everything that we say today. So
3 to make sure that the record is accurate, and
4 especially since the deposition is taking place
5 remotely by video conference in light of the
6 COVID-19 pandemic, it is important that you and
7 I not speak over each other and that only one
8 person speak at a time. So I would ask that
9 you wait until I finish my questions before you
10 start answering them and, for my part, I will
11 try to wait until you finish your answers
12 before I put another question.

13 Is that okay?

14 A. Yes.

15 Q. Okay. Another important point here
16 is it's necessary for you to respond to my
17 questions verbally rather than with nods of the
18 head or gestures or otherwise because only
19 verbal responses can be transcribed.

20 Is that all right?

21 A. Yes.

22 Q. Okay. And if you don't understand
23 one of the questions that I ask you, let me
24 know, and I will try to rephrase or clarify.
25 But understand that the Court is going to

1 assume and the lawyers in the room are going to
2 assume that you have heard and understood every
3 question that I ask you today to which you
4 respond.

5 Do you understand?

6 A. Yes.

7 Q. Okay. There may come moments during
8 the proceeding today when your lawyer,
9 Mr. Berger, objects to one of my questions, but
10 unless Mr. Berger instructs you not to answer a
11 question, you should go ahead and answer the
12 question notwithstanding any objections.

13 Do you understand?

14 A. Yes.

15 Q. Okay. I may take periodic breaks
16 during the deposition, and if you need a break,
17 let me know and I will do my best to
18 accommodate. But I would ask that, if a
19 question is pending, that you answer the
20 question before we take a break.

21 And I understand, Mr. Berger, you
22 know, that questions are privileged, you know,
23 we can -- you can go off the record if there is
24 a question of privilege that you want to
25 discuss with Ms. Ghannam. But apart from that,

1 to the Palestinian Authority and the Palestine
2 Liberation Organization.

3 Do you understand?

4 A. Yes.

5 Q. Okay. And I will, from time to
6 time, refer to the Palestinian Authority as the
7 PA, so if I refer to the PA, that means the
8 Palestinian Authority; is that all right?

9 A. Yes.

10 Q. I will also be referring to the
11 Palestine Liberation Organization from time to
12 time as PLO. So if you hear a question that
13 has PLO, will you understand that that's a
14 reference to the Palestine Liberation
15 Organization?

16 A. Yes.

17 Q. Okay. And at times in questions I
18 will refer to the Observer Mission, and by that
19 I mean the Permanent Observer Mission of the
20 State of Palestine to the United Nations, which
21 is a little bit of a mouthful, but will you
22 understand that?

23 A. Yes.

24 MR. SINAIKO: Okay. Cosette,
25 can we put up tab No. 1, please?

1 (Deposition Exhibit No. 1 was
2 marked for identification.)

3 BY MR. SINAIKO:

4 Q. Ms. Ghannam, are you able to see Tab
5 No. 1 on the screen in front of you?

6 A. No.

7 MR. SINAIKO: Okay. Can we
8 arrange for Ms. Ghannam to see the document
9 that's on the screen?

10 MR. BERGER: I have it on my
11 laptop. Let me show it to her.

12 MR. SINAIKO: That would be
13 great.

14 MR. BERGER: This is the
15 Notice of Deposition.

16 THE WITNESS: Okay.

17 BY MR. SINAIKO:

18 Q. Are you able to see the document
19 that Cosette just put up?

20 A. Yes.

21 MR. SINAIKO: Okay. Karen,
22 can we mark that as Deposition Exhibit No. 1?

23 THE COURT REPORTER: Yes.

24 BY MR. SINAIKO:

25 Q. And have you seen this document

1 before today?

2 A. Yes.

3 Q. And what do you understand this
4 document to be?

5 A. That I would be making a deposition
6 today.

7 Q. Right. I will just represent to you
8 that this is the Notice of Deposition that the
9 Plaintiffs issued to the Defendants in this
10 case and ask you whether it's your
11 understanding that you're here testifying today
12 pursuant to this notice?

13 A. Yes.

14 Q. All right. And let me ask you
15 further whether you did anything in advance of
16 today to prepare for your deposition today.

17 A. I just met with my attorney.

18 Q. Okay. And did you do anything other
19 than meeting with your attorney?

20 A. No.

21 Q. Did you look at any documents in
22 anticipation of your testimony here today?

23 A. Yes.

24 Q. And when did you -- well, let me ask
25 you -- withdrawn.

1 Let me ask you what documents you
2 looked at in anticipation of your testimony
3 here today.

4 A. This particular notice and a few
5 documents that were presented to me by my
6 attorney. I don't recall what they are exactly
7 called, but paperwork that was given to me by
8 my attorney.

9 Q. Okay. Maybe you could describe to
10 me, even if you don't know what they are
11 called, describe to me the nature of the
12 documents that your attorney showed to you?

13 MR. BERGER: I'm going to
14 object and instruct the witness not to answer
15 the question on the grounds of attorney-client
16 privilege the way you have it. Your first
17 question about if she recalls any documents
18 that she reviewed is fine with me.

19 MR. SINAIKO: And she can't
20 describe the documents to me?

21 MR. BERGER: Can you describe
22 to him what documents, if any, you reviewed to
23 prepare for your deposition beyond what you
24 have already given him?

25 THE WITNESS: There was a

1 paper with the names of the employees at the
2 Mission at the United Nations, and something
3 that I signed regarding my place of employment.
4 What I recall.

5 BY MR. SINAIKO:

6 Q. Did you look at any transcripts of
7 other depositions in this case?

8 A. Oh, yes, I did.

9 Q. And which transcripts did you look
10 at?

11 A. I looked partially at Ambassador
12 Mansour's transcript prior to my fall, and that
13 was the end of that. And I literally looked at
14 only a few pages of it.

15 Q. And those are documents that your
16 lawyers showed you?

17 MR. BERGER: Object to the
18 form of the question. Calls for
19 attorney-client information. Instruct the
20 witness not to answer.

21 MR. SINAIKO: On what basis?
22 Where she got the documents is not -- that's a
23 fact. That's not privileged. If I ask her
24 what documents you showed her, that's not a
25 privileged question. She can answer that.

1 MR. BERGER: It is.

2 MR. SINAIKO: I don't
3 understand, Mitch. Why are you doing this?
4 This is obstructing.

5 MR. BERGER: It is not
6 obstructing. It's preserving attorney-client
7 privilege. If you want to agree that her
8 answer to that question won't be argued as a
9 waiver of attorney-client privilege, I'll let
10 her answer.

11 MR. SINAIKO: Fine. We're not
12 going to argue that it's a waiver of
13 attorney-client privilege, but it's not
14 privileged at all. That's our view. But fine,
15 we won't argue that it's a waiver.

16 MR. BERGER: You can answer.

17 MR. SINAIKO: Wait. Let's get
18 the question back so that the witness has it.
19 Can you read it back, Karen?

20 (Reporter read back previous
21 question.)

22 THE WITNESS: Yes.

23 BY MR. SINAIKO:

24 Q. Okay. Apart from these documents
25 you signed related to your employment and the

1 paper with the names of employees and the
2 transcript of Dr. Mansour's deposition, did you
3 look at any other documents in anticipation of
4 your testimony here today?

5 A. Just my calendar.

6 Q. Okay. Anything other than the
7 calendar, plus the other three documents I just
8 mentioned?

9 A. No.

10 Q. Okay. And you mentioned a moment
11 ago that, in addition to looking at these
12 documents, you met with your lawyer. Who did
13 you meet with exactly?

14 A. Mitch.

15 Q. Mr. Berger?

16 A. Mr. Berger, yes.

17 Q. Anyone other than Mr. Berger?

18 A. No.

19 Q. Okay. And on how many occasions did
20 you meet with Mr. Berger?

21 A. We met twice. Twice, I believe.

22 Q. And when was the first time you met
23 with Mr. Berger in anticipation of your
24 deposition here today?

25 A. I don't remember the date. I don't

1 know.

2 Q. I mean ballpark, can you say how
3 long ago it was, roughly?

4 A. Two days -- maybe a week ago.

5 Q. Okay. And when was the second time?

6 A. This is Friday -- Monday.

7 Q. Monday of this week?

8 A. Yeah.

9 Q. Okey-doke. And the first meeting,
10 the one that happened earlier in time, what was
11 the duration of that meeting?

12 A. I can give you an approximate, maybe
13 two to three hours.

14 Q. And the meeting on Monday, what was
15 the duration of that one?

16 A. Maybe two hours.

17 Q. Okay.

18 A. Along those lines.

19 Q. And just for clarity, the only
20 person in attendance at those meetings was
21 Mr. Berger, just Mr. Berger and you; correct?

22 A. Yes.

23 Q. And in anticipation of your
24 deposition today -- let me withdraw that.

25 In advance of your deposition today,

1 apart from counsel, did you speak to anybody
2 about your deposition?

3 A. Just my husband.

4 Q. Did you speak with any of your
5 colleagues at the Observer Mission relating to
6 your deposition in advance of today?

7 A. No. I spoke to no one else.

8 Q. So you didn't talk to Dr. Mansour
9 about your deposition in advance of today?

10 A. I haven't heard from Dr. Mansour in
11 quite a while. No.

12 Q. And you didn't speak with Ambassador
13 Abdelhady-Nasser in advance of today about your
14 deposition?

15 A. We just texted each other. I texted
16 her yesterday morning saying good luck. And
17 then she did the same last night. And I did
18 text her late at night last night telling her
19 about the fall and [REDACTED]

[REDACTED]

[REDACTED]

22 [REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED] That was the extent of it, and she just wished me luck.

Q. Okay. And apart from these communications you just described for me, have you communicated with anybody else?

A. Just my husband.

Q. Concerning your deposition. Just your husband. Okay.

A. Yeah.

Q. Okay. Did you bring any documents with you today to your deposition?

A. No.

Q. Okay.

A. No.

Q. And in advance of today, have you ever testified at a trial?

A. No.

Q. Have you ever testified at any sort of proceeding, like an arbitration?

A. No.

Q. Okay. Are you a citizen of the United States, Ms. Ghannam?

A. Yes.

Q. Are you a natural born citizen of

1 the United States?

2 A. I'm sorry, am I what?

3 Q. A natural born citizen of the United
4 States.

5 A. Yes. I was born in the States.

6 Q. And where do you currently reside?

7 A. I live in Riverdale, New York. It's
8 a community in the Bronx.

9 Q. Excellent. And have you resided at
10 the same place in Riverdale at all times on and
11 after January 4, 2020?

12 [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
16 [REDACTED]
[REDACTED]
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[REDACTED]

Q. Understood. So there is a place in New York where you have been staying, you know, for stretches of time since the COVID pandemic took hold?

A. Correct. My home.

Q. Okay. So apart from the place in Washington where you have been staying from time to time during the COVID pandemic and your home in Riverdale, have there been any other places where you have spent time, you know, on and after January 4 of 2020?

A. No.

MR. SINAIKO: Okay. Why don't we take down Exhibit 1, Cosette, and put up Tab No. 2.

(Deposition Exhibit No. 2 was marked for identification.)

1 BY MR. SINAIKO:

2 Q. Ms. Ghannam, can you see the
3 document that we have put up on the screen?

4 A. Yes.

5 MR. SINAIKO: Okay. And
6 Karen, can you mark this as Deposition Exhibit
7 No. 2, please.

8 THE COURT REPORTER: Yes.

9 BY MR. SINAIKO:

10 Q. Ms. Ghannam, you have seen this
11 document before; correct?

12 A. When I first opened the account
13 years ago, yes.

14 Q. Okay. And what do you recognize
15 this document to be?

16 A. This was my first LinkedIn account.

17 Q. I got it. And let me ask, you know,
18 let me ask, or let me give you just a -- one
19 other sort of point about ground rules. I'm
20 going to be showing you documents, and because
21 we are doing the deposition remotely,
22 typically, we will show you the documents on a
23 screen like this, but if you ever want to see
24 other parts of a document or you want the pages
25 turned so that you can look at different parts,

1 just let us know and Cosette, who is helping us
2 here, she'll do -- you know, she'll turn the
3 pages in whatever way you want -- I mean, just
4 because I want to be sure that you have the
5 opportunity to look at the documents that we
6 put in front of you during the deposition in
7 any way that you feel you need to.

8 Is that okay?

9 A. Yes.

10 MR. BERGER: And I'm sure
11 you'll call her attention to any specific part
12 that you want her to look at.

13 MR. SINAIKO: Of course. I
14 mean, I just don't want her to feel that she is
15 unable to look at any parts of these documents
16 she wants to. You know, she should just ask
17 and that's fine.

18 BY MR. SINAIKO:

19 Q. Okey-doke. So you said a moment ago
20 that you recognized this to be your LinkedIn
21 profile?

22 A. My first LinkedIn profile. There
23 should be probably two virtually somewhere.

24 Q. So there are other -- there are
25 other LinkedIn profiles for you?

1 A. There is another one, yes.

2 MR. SINAIKO: Okay. Cosette,
3 can we turn to the second page of this
4 document? Okay.

5 BY MR. SINAIKO:

6 Q. Do you see, on the page, on Page 2
7 of your first LinkedIn profile, that there is a
8 section that's called education?

9 A. Yes.

10 Q. Okay. And you see the first entry
11 there is George Mason University?

12 A. Yes.

13 Q. And do you see that it says,
14 Bachelor of Arts underneath that, Bachelor of
15 Arts, BA, International Studies and History?

16 A. Yes.

17 Q. Did you, in fact, receive a Bachelor
18 of Arts in International Studies and History
19 from George Mason University?

20 A. Yes.

21 Q. And when did you receive that
22 degree?

23 A. I was Class of '99.

24 Q. Class of '99. And let's look at the
25 next entry below. You see it says, the Johns

1 Hopkins University?

2 A. Yes.

3 Q. And underneath that, it says, Master
4 of Arts, MA, Public and Media Relations and
5 Political Communications?

6 A. That is correct.

7 Q. And is it, in fact, the case, that
8 you received an MA in Public and Media
9 Relations and Political Communications from the
10 Johns Hopkins University?

11 A. That is correct.

12 Q. When did you receive that degree?

13 A. I don't remember what year it was
14 in. That was a little complicated.

15 Q. Okay.

16 A. I took some time off during that.

17 [REDACTED] So I ended up
18 doing that program part-time, but I don't
19 remember what year I actually physically
20 graduated in.

21 Q. Understood. But at some point
22 subsequent to 1999, you received the degree
23 from Johns Hopkins?

24 A. Oh, yes.

25 Q. Okay. And apart from the degree you

1 received from George Mason University and the
2 degree you received from Johns Hopkins
3 University, do you hold any other academic
4 degrees?

5 A. No.

6 Q. Do you hold any professional
7 certifications?

8 A. When I worked in banking, I used to
9 get all sorts of certifications in banking and
10 finance, but I don't recall. That was so long
11 ago.

12 Q. Okay.

13 A. But I remember I used to go down
14 south and take a lot of courses.

15 Q. Do you hold any professional
16 licenses as you sit here today?

17 A. No.

18 Q. Okay. To your knowledge, have you
19 ever held a professional license?

20 A. No.

21 Q. All right. Looking up above the
22 education section on Page 2 of this document,
23 we have marked as our second Deposition
24 Exhibit, and I know it's your older or your
25 initial LinkedIn profile, I see there are two

1 references, one to First Virginia Bank and one
2 to BB&T?

3 A. Uh-huh, yes.

4 Q. And looking at those entries, can
5 you tell me, you know, were those the first two
6 jobs you had after college?

7 A. After college, yes.

8 Q. Okay. So it's accurate, then, that
9 after you graduated from George Mason
10 University, you were in banking from 1999
11 through 2007?

12 A. Yes.

13 Q. Okay. And above that, on Page 2 of
14 this LinkedIn profile, you see there is an
15 entry that says, television host?

16 A. Yes.

17 Q. Can you tell us what that refers to?

18 A. I was a co-host on a TV show on ART
19 network.

20 Q. And what is ART network?

21 A. Arab Radio & Television.

22 Q. And you did that from June of 2004
23 to April of 2007; correct?

24 A. That's what's written, yes.

25 Q. By the way, this LinkedIn profile

1 that we're looking at, this is something that
2 you wrote; correct?

3 A. Yes.

4 Q. And when you wrote it, you intended
5 for it to be accurate; correct?

6 A. Yes.

7 Q. Okay. I notice there is a gap on
8 the -- there is a gap in the LinkedIn profile
9 between April of 2007 and June of, it looks
10 like June of 2008 up above in the entry for
11 Palestinian Diplomatic Missions to the United
12 Nations; do you see that?

13 A. Yes.

14 Q. And what did you do during that
15 time?

16 MR. BERGER: It doesn't say
17 United Nations.

18 THE WITNESS: Not United
19 Nations.

20 BY MR. SINAIKO:

21 Q. I'm so sorry. I apologize. I
22 misread that. It says, Palestinian Diplomatic
23 Mission to the United States.

24 A. Yes. So I took a sabbatical from
25 work [REDACTED]

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I didn't work.

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Q. I understand. So your next job, after being a television host at ART, was working as director of public relations and outreach at the Palestinian Diplomatic Mission to the United States?

A. Yes.

Q. Okay. And how long did you hold that position?

A. I don't remember when I left. Maybe -- I got married in 2015. I believe I left in 2016, so you can do the math. I'm not sure.

I'm a very visual person. That's just the way I work and function. So with numbers, it's hard for me. I have to, like, see them in front of me.

But I just know I got married in 2015 and then I got pregnant in 2016. I had my son in the Washington area, and then I moved down to New York.

So I left -- I believe it was

1 October 2016.

2 Q. And what did you do after that?

3 A. No, no. Wait a second. '17. [REDACTED]
4 was born in 2017. Excuse me. That's what I
5 mean, how you have to see things.

6 I terminated my position. I quit at
7 the Mission in Washington. And I applied for
8 new employment at the Diplomatic Mission to the
9 United Nations.

10 Q. Okay. And do you recall when you
11 started at the Diplomatic Mission to the United
12 Nations?

13 A. I do, oddly. It's one date I
14 remember. I believe my first day was November
15 16 -- it was a Monday -- [REDACTED]
16 [REDACTED]. And it was 2000 and -- say 2017.

17 Q. So in November of 2017, you began
18 work at the Palestine -- at the Observer
19 Mission?

20 A. Yes. I became -- I started a new
21 job at the UN Observer Mission, correct.

22 Q. Okay. And did you have the same
23 title when you moved to the Observer Mission
24 that you previously had at the Palestinian
25 Diplomatic Mission to the United States?

1 Q. Okay. And so do you, typically,
2 record the names of the participants of
3 meetings in your planner when you regard that
4 information as important?

5 A. If Ambassador Mansour is speaking,
6 yes, I do.

7 Q. What about Ambassador
8 Abdelhady-Nasser?

9 A. Yes.

10 Q. What about other people from the
11 Observer Mission, would you record that?

12 A. Yes. Anyone that would be speaking.
13 But, typically, no one else speaks other than
14 those two. It's rare.

15 Q. Okay. By the way, you mentioned a
16 moment ago you might have been tweeting during
17 this meeting that we've been talking about from
18 October 7. You know, how frequently would you
19 say you tweet on the Observer Mission's Twitter
20 account?

21 A. Very frequently.

22 Q. Do you think that's a daily
23 occurrence?

24 MR. BERGER: This is after
25 January 4, 2020?

1 MR. SINAIKO: You know, let me
2 put the question with that limitation in it
3 just so we have a clear record.

4 BY MR. SINAIKO:

5 Q. On and after January 4, 2020, how
6 frequently would you say that you have posted
7 tweets on the Observer Mission's Twitter
8 account?

9 A. I would say very frequently, but it
10 would depend on how busy my workload is.

11 Q. Okay.

12 A. Sometimes more than others. And
13 also depending on what's happening in the
14 world.

15 Q. Okay. Again, during the period, you
16 know, on and after January 4, 2020, how many
17 times a day would you say on average you post
18 tweets to that account, that is, the Observer
19 Mission account?

20 A. If I had to take a guess, on
21 average, on average, once.

22 Q. Okay.

23 A. On average.

24 Q. Okay. That's fine. Let's go to
25 Page 2053. And Ms. Ghannam, if you can just

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Q. Now, taking just the Facebook account for a moment, are you familiar with -- well, right. Are you familiar with the privacy restrictions that can be placed on Facebook accounts?

A. Somewhat.

Q. Are you aware that it's possible to restrict a Facebook account so that the general public cannot see everything that's posted in an account?

A. Yes. Yes.

Q. Are there any such restrictions on the Facebook account that the Observer Mission operates?

A. No.

Q. So it's the case, then, that any member of the public can see anything that is posted on that account; correct?

1 A. Correct.

2 Q. Anywhere in the world?

3 A. Yes.

4 Q. So anyone, any person in the United
5 States with access to the Internet and a
6 Facebook account would be able to see those
7 posts; correct?

8 A. Yes. I have never changed the
9 privacy setting since I started working there.

10 Q. Okay. Now, this -- you probably
11 know this better than I do because you are the
12 media affairs person; is it possible to create
13 similar restrictions with respect to a Twitter
14 account?

15 A. That is a good question. I don't
16 think so.

17 Q. Okay. So, to your knowledge --

18 A. No.

19 Q. To your knowledge, any person with
20 access to Twitter can see anything that the
21 Observer Mission posts on its Twitter account?

22 A. Yes.

23 Q. Okay. So as far as you know, the
24 information that you post to the Observer
25 Mission's Twitter account goes to the public at

1 large; correct?

2 A. Yes.

3 Q. Would it be fair to say that you
4 regard it as important that the Observer
5 Mission's Facebook and Twitter account postings
6 get the broadest possible distribution?

7 A. Yes.

8 Q. And the Twitter and Facebook account
9 postings that you make to the accounts that are
10 maintained by the Observer Mission, are those
11 accounts -- are those postings ever in a
12 language other than English?

13 A. Yes.

14 Q. How frequently are there postings
15 that are not in the English language?

16 A. Very, very, very infrequently.

17 Q. Very infrequently?

18 A. Correct.

19 Q. So would you say that in excess of
20 90 percent of the postings on the Observer
21 Mission's Facebook and Twitter accounts are in
22 the English language?

23 A. If not more, yes.

24 Q. Okay. And, again, this will be a
25 question I'm asking you because you probably

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[REDACTED]

[REDACTED]

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[REDACTED]

Q. I didn't mean to interrupt. I'm so sorry. I think I might have cut you off inadvertently.

A. That's okay.

Q. Your Twitter posts -- not your Twitter posts, the Twitter posts that go on the Observer Mission's Twitter and Facebook feeds, those are the messaging of the Observer Mission and not of the United Nations and not of any other -- any Member State or any other member organization; correct?

A. That is correct.

Q. Okay. When you post to -- well, let me ask this. On and after January 4, 2020, I think we have established that you are the only person who has posted to the Observer Mission's Twitter and Facebook accounts; correct?

A. Correct.

Q. And on and after January 4, 2020, have you made posts to those two social media accounts, that is, the Facebook account and the Twitter account, from the Observer Mission building at 115 East 65th Street in Manhattan?

1 A. Since January 4?

2 Q. Since January 4 of 2020, that is
3 correct.

4 A. Yes, I have.

5 Q. And how many times would you say,
6 just ballpark, on and after January 4, 2020,
7 you have posted to the Twitter account or the
8 Facebook account of the Observer Mission from
9 the Observer Mission building at 115 East 65th
10 Street in Manhattan?

11 A. To take a guess, February, Twitter,
12 maybe 60 times. Facebook, maybe 15 times.
13 Maybe a dozen times.

14 Q. And the reason that that number is
15 in the range you just mentioned is because of
16 the pandemic; correct?

17 A. That is correct.

18 Q. And subsequent to, on or subsequent
19 to January 4, 2020, how many times would you
20 say you have posted or you have made a post to
21 the Observer Mission's Facebook account?

22 A. After January 4 -- excuse me, 2020?

23 Q. On and after January 4 of 2020.

24 A. Facebook? God, I mean, I don't
25 know. I just don't know. That's just a very

1 specific question. I don't know. Maybe once a
2 week. Do the math. I don't know. Once a week
3 since January 2020, on average.

4 Q. So you use Facebook -- oh, sorry.
5 Didn't mean to interrupt.

6 A. It's okay. I can't do the math in
7 my head for you. I don't know.

8 Q. Would it be fair to say that you
9 post to the Observer Mission's Facebook account
10 less than you post to the Observer Mission's
11 Twitter account?

12 A. Yes.

13 Q. Okay. On and after January 4 of
14 2020, how many times would you say that you
15 have posted to the Observer Mission's Twitter
16 account from the building at 115 East 65th
17 Street?

18 A. From the building, like I said,
19 probably around 60 times. I'm just averaging
20 once a day.

21 Q. Okay. And putting aside -- you
22 know, putting aside from the building, you
23 know, from the building at 115 East 65th
24 Street, how many times would you say, in total,
25 you have posted to the Observer Mission's

1 Twitter account on or after January 4, 2020?

2 A. I couldn't even count. Wouldn't
3 even be able to give you a ballpark. A lot.

4 Q. But it's a large number; right?

5 A. Yes.

6 Q. And are you aware, I don't know,
7 I'll ask, are you aware of the location of the
8 servers where the Facebook and Twitter accounts
9 maintained by the Observer Mission reside, you
10 know, the Twitter and Facebook --

11 A. Servers?

12 Q. Yeah.

13 A. No.

14 Q. Okay. Have you ever posted -- well,
15 withdrawn.

16 On and after January 4, 2020, have
17 you ever posted to the Observer Mission's
18 Facebook account other than from within the
19 territory of the United States?

20 A. I have only posted in the United
21 States.

22 Q. Okay. And with respect to the
23 Observer Mission Twitter account, on and after
24 January 4, 2020, have you ever posted to the
25 Twitter account other than from the -- you

1 know, within the territory of the United
2 States?

3 A. I have only posted in the United
4 States.

5 Q. Okay. On and after January 4, 2020,
6 have you left the territory of the United
7 States?

8 A. No.

9 Q. Okay. And on and after -- I think I
10 know the answer to this already because we may
11 have covered it, and I apologize if I'm asking
12 again, I'm just trying to keep all the
13 questions together in the transcript. On and
14 after January 4, 2020, has anybody other than
15 you made a post to either the Observer Mission
16 Facebook account or the Observer Mission
17 Twitter account?

18 A. No.

19 MR. SINAIKO: Okay. So I
20 would ask Cosette to put up on the screen for
21 our next exhibit, which I think is going to be
22 No. 6, all right, I would ask Cosette to put up
23 Tab 19.

24 (Deposition Exhibit No. 6 was
25 marked for identification.)

1 BY MR. SINAIKO:

2 Q. Ms. Ghannam, do you see the
3 document? We're marking this as Exhibit 6. Is
4 it 6? It is 6. We are marking as Exhibit 6
5 the document that I just put up on the screen.
6 Can you see it in front of you?

7 A. Yes.

8 Q. And do you recognize that to be a
9 tweet that you posted to the Observer Mission's
10 Twitter account?

11 A. Yes, I would have written it. But
12 I'm just reading it.

13 Q. Oh, sure. Take your time. If you
14 want to read the -- any document you want to
15 read, feel free, just let us know that you want
16 to read it and we'll turn the pages. You
17 should do whatever you think you need to.

18 A. It's okay. I just want to read the
19 tweet real quickly. Okay, yes.

20 Q. And let me ask a question. And
21 again, I apologize if this question betrays a
22 little bit of lack of knowledge on my part.

23 But was this a retweet of a tweet
24 that had originally been posted by the PLO's
25 Department of Public Diplomacy and Policy?

1 A. Yes.

2 MR. SINAIKO: And Cosette, can
3 we just turn the page here?

4 BY MR. SINAIKO:

5 Q. This document that is now on the
6 screen in front of you, it's another page of
7 Exhibit 6, is this the tweet that was reposted?

8 A. No.

9 Q. Okay. Is this the document that was
10 attached to the tweet that was reposted?

11 A. Not that I recall.

12 Q. Okay. Let's back it up here. Just
13 back up one page.

14 You see what the original -- the
15 original PLO Department of Public Diplomacy and
16 Policy tweet says?

17 A. Yes.

18 Q. Okay. Do you see it makes reference
19 to an official position?

20 A. Yes.

21 Q. And the document that we -- or the
22 page that we showed you a moment ago, is that a
23 copy of the official position that the PLO
24 Department of Public Diplomacy and Policy
25 released along with this tweet?

1 A. It looks like it was down to me.
2 There is nothing written in it other than
3 something in Arabic and it was just one word.

4 Q. Oh. Let's go to the next page. I
5 think there was probably some text at the
6 bottom that you were having difficulty seeing.

7 A. Oh, I can't -- there's no way I can
8 read that.

9 Q. Let's zoom in a little bit. There
10 we go. Is that better?

11 A. Yes, it's better. I mean, I'm not
12 going to read all of it. It's going to waste
13 everyone's time. Okay. What is the question?

14 Q. So the question is, is that the
15 position statement that was attached to the PLO
16 Department of Public Diplomacy -- I'm sorry,
17 Public Diplomacy and Policy that was attached
18 to the tweet that the Observer Mission
19 retweeted?

20 A. It appears so, if it is attached to
21 it.

22 MR. SINAIKO: Let's go to Tab
23 20, and we will mark that as Exhibit 7.

24 (Deposition Exhibit No. 7 was
25 marked for identification.)

1 BY MR. SINAIKO:

2 Q. And do you recognize this to be
3 another tweet that was posted to the Observer
4 Mission's Twitter feed?

5 A. I retweeted it, but yes.

6 Q. Well, I mean, I guess it's a
7 question. Do you recognize this to be a tweet
8 that you posted to the Observer Mission's
9 Twitter account?

10 A. Yes.

11 Q. Okay.

12 A. Yes.

13 Q. And you see that this document has
14 the hashtag LandsDay?

15 A. Yes.

16

22 Q. In general, though -- well,
23 withdrawn.

24 And in this tweet, you are actually
25 retweeting -- well, withdrawn. Let me try this

1 question one more time.

2 This is actually a retweet of a
3 tweet that was posted by another organization
4 within the Palestine Liberation Organization;
5 correct?

6 A. Yes, the Negotiation Affairs
7 Department, yes.

8 [REDACTED]

9 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED] correct?

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[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

23 Q. Understood.

24 MR. SINAIKO: Okay. Let's go

25 to our next tab. This is going to be Tab 22.

1 like to go off the record?

2 MR. SINAIKO: Well, we need to
3 get the audio working. I mean, whatever we
4 have to do. If we have to go off the record to
5 get the audio working, then fine.

6 THE VIDEOGRAPHER: Okay. We
7 are now off the record. The time is 17:24 UTC
8 time.

9 (Discussion held off the
10 record.)

11 THE VIDEOGRAPHER: We are
12 back on the record. The time is 17:26 UTC
13 time.

14 BY MR. SINAIKO:

15 Q. Ms. Ghannam, we are back on the
16 record. Can you see that I have put Exhibit 6,
17 Deposition Exhibit 6 back on the screen in
18 front of you?

19 A. Yes, I can see it.

20 Q. And this is the retweet that we were
21 talking about a moment ago; correct?

22 A. Correct.

23 Q. Okay. And if you look at the bottom
24 of the tweet, you will see that it says, 1:59
25 p.m., February 4, 2020. Do you see that?

1 A. Yes.

2 Q. Would you agree that this was a
3 tweet that was posted at 1:59 p.m. on the 4th
4 of February 2020?

5 A. Yes.

6 Q. Okay. And would you agree that this
7 is a tweet that you posted from the UN --
8 withdrawn.

9 Would you agree that this is a post
10 that -- to Twitter that you made from the
11 Observer Mission building at 115 East 65th
12 Street in Manhattan at the date and time noted
13 on the tweet?

14 A. Most likely, yes, unless I wasn't
15 tweeting from my lunch break because it's close
16 to 2:00.

17 Q. But you would say most likely, just
18 to be clear, you would say most likely --

19 A. Yes.

20 Q. -- you tweeted that from inside the
21 Observer Mission building at 115 East 65th
22 Street in Manhattan?

23 A. Most likely, yes.

24 Q. Let's go back to tab, I think we
25 said Tab 21, and we're marking that as Exhibit

1 8.

2 MR. SINAIKO: Karen, did you
3 get that?

4 THE COURT REPORTER: Yes.
5 Exhibit 8, yes.

6 MR. SINAIKO: Yeah. Let's put
7 up Tab 21. That will be Exhibit 8.

8 BY MR. SINAIKO:

9 Q. All right. And Ms. Ghannam, do you
10 see Exhibit 8 in front of you?

11 A. Yes.

12 Q. Do we agree that this is another
13 tweet that you posted to the Observer Mission's
14 Twitter account?

15 A. Yes.

16 Q. Do we agree that this is a tweet
17 that you posted at 9:00 a.m., on April 12,
18 2020, as stated at the bottom of the tweet?

19 A. Yes.

20 Q. And this is actually a retweet; is
21 that right?

22 A. Yes.

23 Q. And you were retweeting on behalf of
24 the Observer Mission, to the Observer Mission's
25 Twitter account, a tweet that had originally

1 been posted by the PLO Department of Public
2 Diplomacy and Policy; correct?

3 A. Correct. Yes.

4 Q. And this is another communication by
5 the PLO relating to annexation of land in the
6 West Bank; is that correct?

7 MR. BERGER: Object to the
8 form of the question.

9 BY MR. SINAIKO:

10 Q. You may answer.

11 A. It appears so. I can't read all of
12 it, but I believe it was a statement put out by
13 Dr. Ashrawi regarding annexation.

14 [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
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[REDACTED]
[REDACTED]

1 MR. SINAIKO: Let's go to Tab
2 22, which we are going to mark as Exhibit 9.

3 (Deposition Exhibit No. 9 was
4 marked for identification.)

5 BY MR. SINAIKO:

6 Q. And Ms. Ghannam, do you have Exhibit
7 9 in front of you?

8 A. I do.

9 Q. And do you recognize this to be a
10 retweet that you made to the Observer Mission's
11 Twitter account on April 28, 2020, at 6:30
12 p.m.?

13 A. Yes.

14 Q. Okay. And do you recognize this
15 also to be a retweet?

16 A. Yes.

17 Q. And what is it a retweet of?

18 A. It was posted by the Institute of
19 Middle East Understanding on, once again,
20 illegal settlements on Palestinian land that
21 the United Nations opposes, and there's several
22 resolutions that oppose it and it is deemed
23 illegal.

24

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 MR. SINAIKO: Okay. Let's go

11 to Tab 23, and I think we are on Exhibit 10.

12 (Deposition Exhibit No. 10 was
13 marked for identification.)

14 BY MR. SINAIKO:

15 Q. Ms. Ghannam, can you see Deposition
16 Exhibit 10 on the screen in front of you?

17 A. Not yet.

18 Q. I think we may be having another
19 technical problem. It looks like the video is
20 frozen. Can you hear me?

21 A. I can hear you, yes.

22 Q. Can you see Exhibit 10 on the screen
23 in front of you?

24 A. No.

25 MR. SINAIKO: Okay. We

1 definitely are having a technical problem
2 because I, in my Zoom, I can see Exhibit 10 on
3 the screen in front of me, but I think Ms.
4 Ghannam is unable to see it. And we need to
5 resolve that.

6 MR. BERGER: Let me see if I
7 can show her on my laptop, if that will solve
8 the problem.

9 THE WITNESS: Yes, I can see
10 this.

11 MR. SINAIKO: Great.

12 Actually, mine is working again. Okay.

13 BY MR. SINAIKO:

14 Q. Do you recognize this to be a tweet
15 that you posted to the Observer Mission's
16 Twitter account?

17 A. Yes.

18 Q. And when did you make this Twitter
19 post?

20 A. It looks like May 11 at 3:03 p.m.

21 Q. Do you know where you were -- I
22 mean, do you know where you were physically
23 located at the time you made this Twitter post?

24 A. May 11th, I was in Washington.

25 Q. Okay. And the purpose of this

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MR. SINAIKO: Let's go to Tab

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40. That will be Exhibit 11.

6

(Deposition Exhibit No. 11 was

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marked for identification.)

8

BY MR. SINAIKO:

9

Q. Ms. Ghannam, can you see Deposition

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Exhibit 11 in front of you?

11

A. Yes.

12

Q. And can you tell me what you

13

recognize that document to be, if anything?

14

A. Yes. I believe it speaks to the

15

illegal annexation policy by the occupying

16

Tala (phonetic).

17

Q. Okay. And, more generally, you

18

recognize this to be a Twitter post on the

19

Observer Mission's Twitter feed; correct?

20

A. That is correct.

21

Q. And it's actually another retweet;

22

is that right?

23

A. That is correct.

24

Q. And what is it a retweet of?

25

A. It discusses 18 Senate Democrats, I

1 tagged them, expressing their concern regarding
2 unilateral annexation of Palestinian territory.

3 Q. And who made the original post?

4 A. It looks like -- oh, the original
5 post, excuse me, the PLO Department of Public
6 Diplomacy and Policy.

7 Q. Right. And that's an entity that is
8 part of one of the Defendants in this case;
9 correct?

10 A. I -- Public Diplomacy and Policy is
11 an extension of the type of work that the PLO
12 does, I suppose. I don't know whether or not
13 they are Defendants in this case or not, to be
14 quite frank with you. I just know from a media
15 standpoint, without --

16 Q. Let me put the question again.

17 Do you understand that the PLO
18 Department of Public Diplomacy and Policy is
19 part of the Palestine Liberation Organization,
20 one of the Defendants in this case?

21 MR. BERGER: Objection, calls
22 for a legal conclusion, but you can answer
23 again.

24 THE WITNESS: They are part of
25 the PLO, yes.

1 BY MR. SINAIKO:

2 Q. Okay. And you posted this -- well,
3 withdrawn.

4 Is it correct that you retweeted, on
5 the Observer Mission's Twitter account, the
6 original Twitter posts from the PLO Department
7 of Public Diplomacy and Policy to call
8 attention to the fact that members of the
9 United States Congress had expressed concerns
10 about annexation?

11

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MR. SINAIKO: All right.

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Let's go to Tab 41. I think this is going to

23

be 12. So let's mark the next document that

24

pops up as Exhibit 12.

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(Deposition Exhibit No. 12 was

1 marked for identification.)

2 BY MR. SINAIKO:

3 Q. And Ms. Ghannam, can you see Exhibit
4 12 in front of you?

5 A. Yes.

6 Q. And what do you recognize that to
7 be?

8 A. A tweet, it looks -- just a tweet
9 regarding, it's watch now, which looks like
10 it's a video.

11 Q. Right. So this is a Twitter post
12 that you put on the Observer Mission's Twitter
13 feed on July 29 of 2020; correct?

14 A. Correct.

15

19 Q. And the video was prepared by the
20 PLO Department of Public Diplomacy and Policy;
21 correct?

22 A. It was prepared by them

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[REDACTED]

Q. Right. So the question was, this was -- the question was, this is a video that was prepared by the PLO Department of Public Diplomacy and Policy; correct?

A. Correct.

MR. SINAIKO: Okay. Let's mark -- let's put up Tab 24, which we will mark as Exhibit 13.

(Deposition Exhibit No. 13 was marked for identification.)

BY MR. SINAIKO:

Q. Ms. Ghannam, do you have Exhibit 13 in front of you?

A. I do see it, yes.

Q. And what do you recognize this document to be?

A. It's something written against the illegal use of administrative detention, Palestinian prisoners.

Q. So let me just ask the question in a little bit more focused way. Do you recognize this to be a tweet that you posted to the Observer Mission's Twitter feed?

A. Yes.

1 Q. And when did you make this post to
2 the Observer Mission's Twitter feed?

3 A. It looks like October 6, 2020, at
4 1:00 p.m.

5 Q. And this was also a retweet; is that
6 right?

7 A. Yes.

8 Q. And it was a retweet of a tweet
9 originally posted by the PLO Department of
10 Public Diplomacy and Policy; correct?

11 A. Yes.

12 Q. Okay. And the topic of this -- the
13 topic of this tweet was administrative
14 detention; is that right?

15 A. Yes. Illegal administrative
16 detention, correct.

17 [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

25 Q. Understood.

1 MR. SINAIKO: So let's go to
2 Tab 25, which we will mark as Exhibit 14.

3 (Deposition Exhibit No. 14 was
4 marked for identification.)

5 BY MR. SINAIKO:

6 Q. Ms. Ghannam, can you see Exhibit 14
7 in front of you?

8 A. Most of it. Your face and my face
9 block off the right side of it.

10 Q. Let's fix it so that you can see --
11 I want to do whatever -- can you see it better
12 now?

13 A. That works.

14 Q. All righty. So can you see the
15 document now?

16 A. Yes.

17 Q. And can you tell me whether that's a
18 tweet that you posted to the Observer Mission's
19 Twitter feed?

20 A. Yes.

21 Q. And when did you make this posting
22 to the Observer Mission's Twitter feed?

23 A. November 28, 2020, at 2:27 p.m.

24 Q. By any chance, do you know where you
25 were located physically when you made that

1 posting?

2 A. Thanksgiving, that first year, after
3 COVID -- I believe we were in Washington.

4 Q. But you weren't in the Observer
5 Mission building?

6 A. No.

7 Q. Okay. And the purpose of -- would
8 it be fair to say that the purpose of this
9 tweet was to call public attention to a letter
10 that Dr. Mansour wrote to a UN official?

11

15 Q. Let's go to the attachment because
16 that's part of the exhibit.

17 A. Okay.

18 Q. Let me just ask the question again.
19 Do you see that the document referenced in the
20 Twitter post is a letter that --

21 A. A letter by --

22 Q. I'm sorry?

23 A. You would have to scroll all the way
24 to the bottom to see who it was written by.

25 Q. Certainly. Let's do that so you get

1 to see it.

2 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6 Q. Let's go down to the bottom of the
7 letter for just a moment. You will see that it
8 appears to be signed by Dr. Khalil El-Halabi.
9 Do you see that?

10 A. Yes.

11 Q. Do you understand this to be a
12 letter that Dr. Khalil El-Halabi wrote to a UN
13 official or to -- or perhaps to, you know,
14 Ambassador Mansour?

15 A. It could be -- it could have been
16 that he was quoted in the letter. I didn't
17 write the letter. I just posted it.

18 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

22 [REDACTED]

24 MR. SINAIKO: Let's go to Tab
25 26, which we will mark as Exhibit 15.

1 (Deposition Exhibit No. 15 was
2 marked for identification.)

3 BY MR. SINAIKO:

4 Q. Ms. Ghannam, do you have Exhibit 15
5 in front of you?

6 A. I do.

7 Q. Do you recognize this to be another
8 post that you put on the Observer Mission's
9 Twitter feed?

10 A. Yes.

11 Q. And when did you put this post on
12 the Observer Mission's Twitter feed?

13 A. January 11, 2021 at 9:16 a.m.

14 Q. And it says, on the top of the first
15 line, statement by PMOFA. Do you see that?

16 A. Yes.

17 Q. What is PMOFA?

18 A. The Palestinian Ministry of Foreign
19 Affairs.

20 Q. So this was a tweet by which the
21 Observer Mission was disseminating a message
22 created by the Ministry of Foreign Affairs;
23 correct?

24 A. This is correct.

25 Q. And the Ministry of Foreign Affairs,

1 that is -- or the statement by the Ministry of
2 Foreign Affairs, pardon me, is that the
3 document attached at the bottom of the tweet?

4 A. Yes. I believe -- I believe it's
5 actually a media brief drafted by NAD, the
6 Negotiation Affairs Department.

7 Q. And it's the PLO -- that's the
8 Palestine Liberation Organization Negotiation
9 Affairs Department; correct?

10 A. Yes.

11 Q. And is that part of the Ministry of
12 Foreign Affairs?

13 A. No.

14 Q. What is the connection between the
15 Negotiation Affairs Department and the Ministry
16 of Foreign Affairs, if any?

17 A. I don't know the exact legal
18 connection between the two. My specialty is
19 not in that realm of work.

20

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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BY MR. SINAIKO:

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MR. SINAIKO: Okay. Let's go

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to Tab 27. That will be Exhibit 16.

11

(Deposition Exhibit No. 16 was

12

marked for identification.)

13

BY MR. SINAIKO:

14

Q. And Ms. Ghannam, can you see Exhibit

15

16? I think the video might be frozen again so

16

I'm not sure you can see it.

17

A. Not yet.

18

MR. SINAIKO: Let's give it a

19

moment and if it doesn't -- if it doesn't pop

20

up, Mitch, maybe we can show her the document

21

on your laptop.

22

MR. BERGER: It's popping up.

23

THE WITNESS: Okay. Yes, I

24

remember this.

25

BY MR. SINAIKO:

1 Q. Maybe you can start by telling us,
2 in a high level way, whether this is yet
3 another tweet that you posted to the Observer
4 Mission's Twitter account?

5 A. Yes, I did.

6 Q. Okay. And this was done on February
7 14, 2021; correct?

8 A. Correct.

9 Q. Okay. And what exactly was this
10 Twitter, tweet -- let me withdraw that.

11 What exactly was this tweet
12 disseminating?

13 A. Why was it disseminated; is that
14 your question?

15 Q. I was asking what was being
16 disseminated through this tweet.

17 A. Oh. It was stories of the
18 illegality of the Israeli citizenship law which
19 forces citizens to stay away from each other
20 because of the illegal occupation.

21 Q. [REDACTED]

[REDACTED]

[REDACTED] --

24 A. [REDACTED] --

25 [REDACTED]

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MR. SINAIKO: Okay. Let's go

to Tab 28, which we will mark as Exhibit 17.

(Deposition Exhibit No. 17 was
marked for identification.)

BY MR. SINAIKO:

Q. All right. Ms. Ghannam, are you
able to see Exhibit 17?

A. Not yet.

Q. Okay. Would you let me know when it
pops up?

A. Okay.

Q. This is so much easier in person, I
have to tell you.

MR. BERGER: I've got it on my
laptop, so let me show it to you. Can you see
it from here? There you go. It's on the big
screen now.

THE WITNESS: Okay.

BY MR. SINAIKO:

Q. Do you recognize this to be another

1 tweet that you posted to the Observer Mission's
2 Twitter account?

3 A. Yes.

4 Q. And it's a tweet that you posted on
5 May 11; correct?

6 A. Yes.

7 Q. And this is a tweet -- what was the
8 nature of this tweet? Maybe you can tell us
9 that. I'll try to ask it in a more open-ended
10 way.

11 A. Sure. So a Mark Ruffalo, which many
12 of you know is a celebrity, used his platform
13 to expose the illegality of the potential
14 expulsion of 1500 Palestinians from occupied
15 Jerusalem.

16 Q. And in this tweet, the Observer
17 Mission thanked Mr. Ruffalo for making his
18 post; is that correct?

19 A. Yes, I did.

20 Q. Okay. Let's go to the next page of
21 this one. Is that Mr. Ruffalo's post that you
22 were forwarding?

23 A. I believe I was retweeting it, yes.

24 Q. Okay. And you see that
25 Mr. Ruffalo's post, in turn, attached a

1 document?

2 A. Although. Would you mind going back
3 for a second, because I think --

4 Q. Not at all.

5 A. -- I might have just retweeted.
6 Okay. I'm sorry, go ahead. Uh-huh.

7 Q. Do you see that Mr. Ruffalo's tweet
8 that the Observer Mission retweeted to its own
9 Twitter account, in turn, attached the
10 document?

11 A. I may not have noticed it at the
12 time. I don't recall right now. There was a
13 lot going on during this time period.

14 Q. Understood. But you see that there
15 is a document attached to Mr. Ruffalo's tweet;
16 correct?

17 A. I do see that.

18 Q. And do you understand what that
19 document is?

20 A. You'd have to open it for me to look
21 at it. I don't recall.

22 Q. Let's go to the next page.

23 A. Okay.

24 Q. Do you understand what that might
25 be?

1 A. No.

2 Q. Do you want to -- do you need --
3 maybe we should show her the rest of the pages
4 of it.

5 A. Assuming it's some sort of petition.

6 Q. Okay. Right. So Mr. Ruffalo's
7 tweet -- well, Mr. Ruffalo's tweet attached a
8 petition that members of the public could sign
9 relating to this topic; correct?

10 A. It appears so.

11 [REDACTED]
[REDACTED]
[REDACTED];

14 [REDACTED]

15 [REDACTED]

16 MR. SINAIKO: Okay. Let's go
17 to Tab 29, which will be Exhibit 18.

18 (Deposition Exhibit No. 18 was
19 marked for identification.)

20 BY MR. SINAIKO:

21 Q. Okay. We're going to be on Tab 29.
22 That will be Exhibit 18.

23 Mr. Ghannam, if you can just let me
24 know when you are able to see that.

25 MR. BERGER: I'll show it to

1 her on my laptop.

2 MR. SINAIKO: I've got to say,
3 I can't wait until we're able to do these
4 things in person again. This is just
5 incredibly painful.

6 MR. BERGER: She's got it on
7 my laptop for now, until it pops up on the big
8 screen.

9 BY MR. SINAIKO:

10 Q. So Ms. Ghannam, can you see
11 Deposition Exhibit 18 now?

12 A. Yes.

13 Q. And this is another tweet that you
14 posted to the Observer Mission's Twitter
15 account; is that correct?

16 A. Yes.

17 Q. And you made that post on May 15,
18 2021; is that correct?

19 A. Yes.

20 Q. There, now you can see it on the big
21 screen. Once your video pops up, I know you
22 can see it.

23 So you've got it on the screen in
24 front of you now?

25 A. Yes.

1 Q. Was this -- I see that this one,
2 this tweet actually has the SaveSheikhJarrah
3 hashtag; do you see that?

4	A. Yes.
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A horizontal bar chart titled 'Percentage of respondents who believe that the government should take action to address climate change, categorized by age group'. The y-axis lists age groups: 18-24, 25-34, 35-44, 45-54, 55-64, 65-74, 75-84, and 85+. The x-axis represents the percentage, ranging from 0 to 100 in increments of 20. Each age group has a corresponding black horizontal bar. The data shows that the highest percentage of respondents (95%) in the 18-24 age group believe the government should take action, while the lowest percentage (65%) is in the 85+ age group.

Age Group	Percentage
18-24	95
25-34	90
35-44	95
45-54	85
55-64	95
65-74	85
75-84	90
85+	65

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] ?

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] .

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All of this falls within my

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framework at the UN because all of these issues

17

and everything that you have asked me thus far

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are things that the UN discusses regularly as

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illegal and against the UN charter and the UN

20

framework.

21

Q. I notice -- I notice, Ms. Ghannam,

22

that the first line of this tweet references

23

@POTUS. Do you see that?

24

A. Yes, the President of the United

25

States.

_____?

_____?

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[REDACTED]

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[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]?

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MR. BERGER: Objection, asked

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and answered. You may answer again.

14

BY MR. SINAIKO:

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Q. You may answer.

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[REDACTED]
[REDACTED]
[REDACTED]
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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]; [REDACTED]

[REDACTED]

MR. BERGER: Objection. It's

not only asked and answered, but the reason why

you keep coming back is that it's

argumentative. So I object to the

argumentative questioning of this witness.

MR. SINAIKO: She can answer

the question.

MR. BERGER: Do you have

anything to add to your previous answer?

[REDACTED].

MR. SINAIKO: She can answer

the question that I ask, not the questions that

you ask, Mr. Berger.

MR. BERGER: You've asked this

question three times. It's argumentative,

asked and answered. You may answer it again.

MR. SINAIKO: I would like the

question read back please, Karen.

(Reporter read back from the

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[REDACTED]

[REDACTED]

MR. SINAIKO: Let's mark as
our next exhibit Tab 30. I think this will be
Exhibit 19.

(Deposition Exhibit No. 19 was
marked for identification.)

BY MR. SINAIKO:

Q. Ms. Ghannam, can you see Exhibit 19
in front of you?

A. Yes.

Q. Okay. And you recognize -- what do
you recognize this to be, if anything?

A. I recognize this very well. It was
a mother and a child who were stuck under the
rubble of their house after it being illegally
shelled and begging for help so that they were
not to die.

Q. This was a Twitter post that was put
on -- that you put on the Observer Mission's
Twitter feed; correct?

A. Absolutely correct.

Q. And the topic was the one that you
just mentioned; correct?

A. Yes.

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MR. SINAIKO: Okay. Let's go
to Tab 31, which we will mark as Exhibit 20.

(Deposition Exhibit No. 20 was
marked for identification.)

BY MR. SINAIKO:

Q. Do you see Deposition Exhibit 20 on
the screen?

A. No. Yes, now I do.

Q. And do you recognize that to be
another tweet that you posted to the Observer
Mission's Twitter account on May 17, 2021?

A. Yes.

Q. Okay. And do you see that this
Twitter post makes reference to AOC?

A. Yes.

Q. Who is that?

A. Alexandria Ortezt -- I always forget
her name. The representative from New York.

Q. Right. Alexandria Ocasio-Cortez; is

1 that right?

2 A. Yes.

3 Q. And what about Bush?

4 A. Yes. Cori Bush.

5 Q. And what about --

6 A. John Oliver.

7 Q. Uh-huh, who else?

8 A. Ali Velshi, and then Reid, I forget

9 his first name, yes.

10 Q. And what information was this

11 Twitter post conveying?

12 [REDACTED]

[REDACTED]

[REDACTED]

15 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]?

20 [REDACTED]

21 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

MR. SINAIKO: Okay. Let's put
up Tab 32 and let's mark that as our next
exhibit, which will be Exhibit 21.

(Deposition Exhibit No. 21 was
marked for identification.)

BY MR. SINAIKO:

Q. Ms. Ghannam, can you see Exhibit 21?

A. Not yet.

MR. BERGER: Every time I show
her my laptop, it pops on the video.

MR. SINAIKO: It's like
clockwork.

(Off-the-record discussion
held.)

BY MR. SINAIKO:

Q. Okay. Can you see the document now,
Exhibit 21?

A. Yes.

Q. And that's another posting that you
made to the Observer Mission's Twitter account?

A. Yes.

Q. And that was a retweet?

1 A. Yes.

2 Q. It was a retweet of a tweet that
3 originally was put up by Senator Warren;
4 correct?

5 A. Yes.

6 Q. And do you think you retweeted
7 Senator Warren's tweet the same day that
8 Senator Warren put it up on her own feed?

9 A. I can't tell you.

10 [REDACTED]

[REDACTED]

12 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] ?

16 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

23 MR. SINAIKO: Okay. Let's go

24 to Tab 33, which we will mark as Exhibit 22.

25 (Deposition Exhibit No. 22 was

1 marked for identification.)

2 MR. SINAIKO: And Mitch, if
3 you could just put the laptop in front of her
4 now so that this works more promptly this time.

5 MR. BERGER: Yeah. I don't
6 have it yet. See, it worked instantly.

7 MR. SINAIKO: Like magic.

8 BY MR. SINAIKO:

9 Q. Anyway, Ms. Ghannam, do you see
10 Exhibit 22 in front of you?

11 A. I do.

12 Q. And do you recognize that to be a
13 tweet that you posted to the Observer Mission's
14 Twitter feed on May 24th of this year?

15 A. Yes.

16 Q. And the purpose of this --

17 A. Yes, I recognize it.

18 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] ?

22 [REDACTED]

23 [REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

MR. SINAIKO: Okay. And let's

mark, as Exhibit 23, a Twitter post dated July

9 of 2021. That will be Tab 34, Cosette.

(Deposition Exhibit No. 23 was
marked for identification.)

BY MR. SINAIKO:

Q. Okay. And Ms. Ghannam, do you
recognize -- can you see Deposition Exhibit 23
in front of you now?

A. Yes.

Q. And do you recognize that to be a
posting that you made to the Observer Mission's
Twitter feed earlier this month?

A. Yes, I retweeted it.

Q. Right. And this is a retweet from
the PLO's Negotiation Affairs Division; is that
right?

A. Department, yes.

Q. Sorry. I got the title -- I
misspoke. It's the Negotiation Affairs

1 Department?

2 A. That's okay. Yes.

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Q.

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A.

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Q.

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MR. SINAIKO: Excellent. We
can take that one down. If it's okay -- if
it's okay with everybody, I like to just go off
the record for five minutes.

MR. BERGER: Yeah.

MR. SINAIKO: Good enough.

Thanks.

THE VIDEOGRAPHER: We are now

C E R T I F I C A T E

- - -

I, NADIA GHANNAM, do hereby
certify that I have read the foregoing
transcript and it is a true and correct copy of
my deposition, except for the changes, if any,
made by me on the attached Deposition
Correction Sheet.

Date

1	ERRATA	SHEET	REASON FOR
2	PAGE	LINE	CHANGE/CORRECTION
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COMMONWEALTH OF PENNSYLVANIA)
) SS
COUNTY OF ALLEGHENY)

CERTIFICATE

I, Karen A. Nickel, a notary public in and for the Commonwealth of Pennsylvania, do hereby certify that the witness, NADIA GHANNAM, was by me first duly sworn to testify the truth, the whole truth, and nothing but the truth; that the foregoing deposition was taken at the time and place stated herein; and that the said deposition was recorded stenographically by me and then reduced to typewriting under my direction, and constitutes a true record of the testimony given by said witness.

I further certify that I am not a relative, employee or attorney of any of the parties, or a relative or employee of either counsel, and that I am in no way interested directly or indirectly in this action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office this 27th day of July 2021.



Karen A. Nickel, Notary Public
Registered Professional Reporter
Certified Realtime Reporter